

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM BEECHWOOD LITIGATION,

SENIOR HEALTH INSURANCE COMPANY OF
PENNSYLVANIA,

Plaintiff,

-v-

BEECHWOOD RE LTD., et al.,

Defendants.

MARTIN TROTT and CHRISTOPHER SMITH, as
Joint Official Liquidators and Foreign Representatives
of PLATINUM PARTNERS VALUE ARBITRAGE
FUND L.P. (in Official Liquidation) and PLATINUM
PARTNERS VALUE ARBITRAGE FUND L.P.
(in Official Liquidation),

Plaintiffs,

-v-

PLATINUM MANAGEMENT (NY) LLC, et al.,

Defendants.

MELANIE L. CYGANOWSKI, as Equity Receiver for
PLATINUM PARTNERS CREDIT OPPORTUNITIES
MASTER FUND LP, PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND (TE) LLC, PLATINUM
PARTNERS CREDIT OPPORTUNITIES FUND LLC,
PLATINUM PARTNERS CREDIT OPPORTUNITIES
FUND INTERNATIONAL LTD., PLATINUM
PARTNERS CREDIT OPPORTUNITIES FUND
INTERNATIONAL (A) LTD., and PLATINUM

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/3/19

No. 1:18-cv-06658-JSR

No. 1:18-cv-06658-JSR

No. 1:18-cv-10936-JSR

No. 1:18-cv-12018-JSR

PARTNERS CREDIT OPPORTUNITIES FUND (BL)	:
LLC,	:
	:
Plaintiff,	:
	:
v.	:
	:
BEECHWOOD RE LTD., et al.,	:
	:
Defendants.	:
	:
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**STIPULATION AND ORDER OF
PROTECTION PURSUANT TO FRE 502(d)**

IT IS HEREBY STIPULATED AND AGREED by and among the parties in the above-captioned actions captioned *Senior Health Insurance Company of Pennsylvania v. Beechwood Re Ltd.*, No. 1:18-cv-06658-JSR, *Trott v. Platinum Management (NY), LLC*, No. 1:18-cv-10936-JSR, and *Cyganowski, as Equity Receiver v. Beechwood Re Ltd.*, No. 1:18-cv-12018-JSR (collectively, the “Actions”), through their undersigned counsel, as follows:

1. This Stipulation and Order (hereinafter, “Order”) is entered pursuant to Rule 502(d) of the Federal Rules of Evidence.

2. The production or disclosure of attorney-client privileged, work product-protected or otherwise protected documents or information (including, without limitation, electronically-stored information (“ESI”)) (“Privileged Material”) in the Actions, whether inadvertent or otherwise, is not a waiver of any applicable attorney-client privilege, work product or other protection. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

3. Nothing contained herein is intended to or shall serve (a) to limit a party’s right to conduct a review of documents or ESI, including metadata, prior to production for relevance, responsiveness, and/or privilege and to withhold documents and ESI from production on the

grounds of the attorney-client privilege, work product doctrine or other immunities, or (b) to require a party to conduct such a review.

4. Nothing contained herein is intended to extend protection to documents and information for which any applicable privilege or protection has been waived by means other than production or disclosure in the Actions.

5. This Stipulation also is not intended to limit any party's right to challenge any review of Privileged Material by another party or its counsel, whether such review occurred prior to or subsequent to the entry of this Stipulation and Order.

6. Any party or counsel receiving Privileged Material that has been produced (whether inadvertently or otherwise) shall, upon request of the producing party or the producing party's counsel, promptly return all copies of such material in his, her or its possession, delete any versions thereof on any database the party receiving the Privileged Material maintains, and make no use of such material; *provided, however*, that the party or counsel returning such material shall have the right to apply to the Court for an order that such material was not protected (prior to the disclosure) by any privilege or doctrine. The failure of a producing party to demand the return of Privileged Material that has been produced shall not constitute a waiver of, or otherwise vitiate, any privilege or protection applicable to such Privileged Material or any of the producing party's rights under this Order.

7. This Order may be executed in any number of counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

8. This Order may be executed by facsimile or by electronic Portable Document Format ("PDF"). A facsimile or electronic signature shall be deemed an original signature for purposes of this Order.

9. This Court shall retain jurisdiction over all persons subject to this Order to the extent necessary to enforce any obligations arising hereunder or to impose sanctions for any contempt thereof.

SO STIPULATED AND AGREED.

OTTERBOURG P.C.

By: Adam C. Silverstein
Adam C. Silverstein
Erik B. Weinick
Andrew S. Halpern
230 Park Avenue
New York, New York 10169
Telephone: (212) 661-9100
E-mail: asilverstein@otterbourg.com
eweinick@otterbourg.com
ahalpern@otterbourg.com

Attorneys for Melanie L. Cyganowski, as Receiver for Platinum Partners Credit Opportunities Master Fund LP, Platinum Partners Credit Opportunities Fund (TE) LLC, Platinum Partners Credit Opportunities Fund LLC, Platinum Partners Credit Opportunities Fund International Ltd., Platinum Partners Credit Opportunities Fund International (A) Ltd., Platinum Partners Credit Opportunities Fund (BL) LLC

KATTEN MUCHIN ROSENMAN LLP

By: _____
Anthony Paccione
575 Madison Avenue
New York, NY 10022
Telephone: (212) 940-8502
Email: Anthony.paccione@kattenlaw.com

Attorneys for Olive Tree Capital LLC

LIPSIUS BENHAIM LAW LLP

By: _____
Ira Lipsius
80-02 Kew Gardens Rd., Suite 1030
Kew Gardens, NY 11415
Telephone: (212) 981-8442
Email: ilipsius@lipsiuslaw.com

Attorneys for Beechwood Re Ltd., Beechwood Re Investments, LLC, B Asset Manager LP, B Asset Manager II LP, Beechwood Re Holdings, Inc., Beechwood Bermuda International LTD., Beechwood Bermuda LTD., BAM Administrative Services LLC, Moshe M. Feuer, Scott A. Taylor, Dhruv Narain, Beechwood Capital Group LLC, Beechwood Re Investments, LLC, Beechwood Re Holdings, Inc., BBLN-PEDCO Corp., Illumin Capital Management LP, BHLN-PEDCO Corp.

WALDEN MACHT & HARAN LLP

By: _____
Sean T. Haran
Adam P. Cohen
Jeffrey L. Ding
1 Battery Park Plaza
New York, NY 10004
Telephone: (212) 335-2030
Email: sharan@wmhlaw.com
acohen@wmhlaw.com
jding@wmhlaw.com

Attorneys for Naftali Manela

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OTTERBOURG P.C.

By: Adam C. Silverstein
Adam C. Silverstein
Erik B. Weinick
Andrew S. Halpern
230 Park Avenue
New York, New York 10169
Telephone: (212) 661-9100
E-mail: asilverstein@otterbourg.com
eweinick@otterbourg.com
ahalpern@otterbourg.com

Attorneys for Melanie L. Cyganowski, as Receiver for Platinum Partners Credit Opportunities Master Fund LP, Platinum Partners Credit Opportunities Fund (TE) LLC, Platinum Partners Credit Opportunities Fund LLC, Platinum Partners Credit Opportunities Fund International Ltd., Platinum Partners Credit Opportunities Fund International (A) Ltd., Platinum Partners Credit Opportunities Fund (BL) LLC

KATTEN MUCHIN ROSENMAN LLP

By: _____
Anthony Paccione
575 Madison Avenue
New York, NY 10022
Telephone: (212) 940-8502
Email: Anthony.paccione@kattenlaw.com

Attorneys for Olive Tree Capital LLC

LIPSIUS BENHAIM LAW LLP

By: _____
Ira Lipsius
80-02 Kew Gardens Rd., Suite 1030
Kew Gardens, NY 11415
Telephone: (212) 981-8442
Email: ilipsius@lipsiuslaw.com

Attorneys for Beechwood Re Ltd., Beechwood Re Investments, LLC, B Asset Manager LP, B Asset Manager II LP, Beechwood Re Holdings, Inc., Beechwood Bermuda International LTD., Beechwood Bermuda LTD., BAM Administrative Services LLC, Moshe M. Feuer, Scott A. Taylor, Dhruv Narain, Beechwood Capital Group LLC, Beechwood Re Investments, LLC, Beechwood Re Holdings, Inc., BBLN-PEDCO Corp., Illumin Capital Management LP, BHLN-PEDCO Corp.

WALDEN MACHT & HARAN LLP

By: _____
Sean T. Haran
Adam P. Cohen
Jeffrey L. Ding
1 Battery Park Plaza
New York, NY 10004
Telephone: (212) 335-2030
Email: sharan@wmhlaw.com
acohen@wmhlaw.com
jding@wmhlaw.com

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OTTERBOURG P.C.

By: _____

Adam C. Silverstein
Erik B. Weinick
Andrew S. Halpern
230 Park Avenue
New York, New York 10169
Telephone: (212) 661-9100
E-mail: asilverstein@otterbourg.com
eweinick@otterbourg.com
ahalpern@otterbourg.com

Attorneys for Melanie L. Cyganowski, as Receiver for Platinum Partners Credit Opportunities Master Fund LP, Platinum Partners Credit Opportunities Fund (TE) LLC, Platinum Partners Credit Opportunities Fund LLC, Platinum Partners Credit Opportunities Fund International Ltd., Platinum Partners Credit Opportunities Fund International (A) Ltd., Platinum Partners Credit Opportunities Fund (BL) LLC

KATTEN MUCHIN ROSENMAN LLP

By: _____

Anthony Paccione
575 Madison Avenue
New York, NY 10022
Telephone: (212) 940-8502
Email: Anthony.paccione@kattenlaw.com

Attorneys for Olive Tree Capital LLC

LIPSIUS BENHAIM LAW LLP


By: _____

Ira Lipsius
80-02 Kew Gardens Rd., Suite 1030
Kew Gardens, NY 11415
Telephone: (212) 981-8442
Email: ilipsius@lipsiuslaw.com

Attorneys for Beechwood Re Ltd., Beechwood Re Investments, LLC, B Asset Manager LP, B Asset Manager II LP, Beechwood Re Holdings, Inc., Beechwood Bermuda International LTD., Beechwood Bermuda LTD., BAM Administrative Services LLC, Moshe M. Feuer, Scott A. Taylor, Dhruv Narain, Beechwood Capital Group LLC, Beechwood Re Investments, LLC, Beechwood Re Holdings, Inc., BBLN-PEDCO Corp., Illumin Capital Management LP, BHLN-PEDCO Corp.

WALDEN MACHT & HARAN LLP


By: _____


Sean T. Haran
Adam P. Cohen
Jeffery L. Ding
1 Battery Park Plaza
New York, NY 10004
Telephone: (212) 335-2030
Email: sharan@wmhlaw.com
acohen@wmhlaw.com
jding@wmhlaw.com

Attorneys for Naftali Manela

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

DLA PIPER LLP (US)

By: 
Aidan M. McCormack
Mark L. Deckman
R. Brian Seibert
1251 Avenue of the Americas, 27th Floor
New York, New York 10020
Telephone: (212) 335-4500
E-mail: aidan.mccormack@dlapiper.com
brian.seibert@dlapiper.com
mark.deckman@dlapiper.com

-and-

James D Mathias (pro hac vice)
Kathleen A. Birrane (pro hac vice)
Ellen E. Dew (pro hac vice)
6225 Smith Avenue
Baltimore, Maryland 21209-3600
Telephone: (410) 580-3000
E-mail: james.mathias@dlapiper.com
kathleen.birrane@dlapiper.com
ellen.dew@dlapiper.com

*Attorneys for Senior Health Insurance
Company of Pennsylvania and Fuzion
Analytics, Inc.*

ALSTON & BIRD LLP

By: _____
John M. Aerni
Adam J. Kaiser
Daniella P. Main
Jenna Chelsea Polivy
90 Park Avenue
New York, NY 10016
Telephone: (212) 210-9400
Email: adam.kaiser@alston.com
john.aerni@alston.com
daniella.main@alston.com

*Attorneys for Defendants Bankers Consecro
Life Insurance Company, Washington National
Insurance Company, CNO Financial Group,
Inc. and 40/86 Advisors, Inc.*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

DLA PIPER LLP (US)

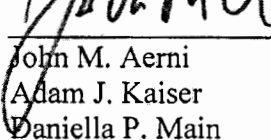
By: _____
Aidan M. McCormack
Mark L. Deckman
R. Brian Seibert
1251 Avenue of the Americas, 27th Floor
New York, New York 10020
Telephone: (212) 335-4500
E-mail: aidan.mccormack@dlapiper.com
brian.seibert@dlapiper.com
mark.deckman@dlapiper.com

-and-

James D Mathias (pro hac vice)
Kathleen A. Birrane (pro hac vice)
Ellen E. Dew (pro hac vice)
6225 Smith Avenue
Baltimore, Maryland 21209-3600
Telephone: (410) 580-3000
E-mail: james.mathias@dlapiper.com
kathleen.birrane@dlapiper.com
ellen.dew@dlapiper.com

*Attorneys for Senior Health Insurance
Company of Pennsylvania and Fuzion
Analytics, Inc.*

ALSTON & BIRD LLP

By:  _____
John M. Aerni
Adam J. Kaiser
Daniella P. Main
Jenna Chelsea Polivy
90 Park Avenue
New York, NY 10016
Telephone: (212) 210-9400
Email: adam.kaiser@alston.com
john.aerni@alston.com
daniella.main@alston.com

*Attorneys for Defendants Bankers Conseco
Life Insurance Company, Washington National
Insurance Company, CNO Financial Group,
Inc. and 40/86 Advisors, Inc.*

SIGNATURES CONTINUE FROM PRECEDING PAGE

PROSKAUER ROSE LLP

By: 

Mark D. Harris
Steven H. Holinstat
Stacy P. Eilbaum
Edward J. Canter

11 Times Square
New York, NY 10036
Telephone: (212) 969-3000
Email: mharris@proskauer.com
sholinstat@proskauer.com
seilbaum@proskauer.com
ecanter@proskauer.com

*Attorneys for B Asset Manager, L.P.,
Beechwood Bermuda International Ltd.,
Beechwood Re Investments, LLC, Mark Feuer,
Scott Taylor, and Dhruv Narain in the SHIP
Action*

MOSKOWITZ & BOOK, LLP

By: _____

Avraham C. Moskowitz
345 Seventh Avenue, 21st Floor
New York, NY 10001
Telephone: (212) 221-7999
Email: amoskowitz@mb-llp.com

*Attorneys for Platinum F.I. Group, LLC and
Abraham Grossman*

HOLLAND & KNIGHT LLP

By: _____

Warren E. Gluck, Esq.
Barbra R. Parlin, Esq.
John L. Brownlee, Esq.
Belevetz, Esq.
Richard A. Bixter Jr., Esq.

31 West 52nd Street
New York, New York 10019
Telephone: (212) 513-3200
Email: warren.gluck@hklaw.com
barbra.parlin@hklaw.com
john.brownlee@hklaw.com
timothy.belevetz@hklaw.com
richard.bixter@hklaw.com

*Attorneys for Plaintiffs Martin Trott and
Christopher Smith, as Joint Official
Liquidators and Foreign Representatives of
Platinum Partners Value Arbitrage Fund L.P.
(in Official Liquidation), and for Platinum
Partners Value Arbitrage Fund L.P. (in
Official Liquidation)*

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: _____

Daniel Tepper
270 Madison Avenue
New York, NY 10016
Telephone: (212) 545-4600
Email: tepper@whafh.com

Attorneys for Leon Meyers

SIGNATURES CONTINUE FROM PRECEDING PAGE

PROSKAUER ROSE LLP

By: _____

Mark D. Harris
Steven H. Holinstat
Stacy P. Eilbaum
Edward J. Canter

11 Times Square
New York, NY 10036
Telephone: (212) 969-3000
Email: mharris@proskauer.com
sholinstat@proskauer.com
seilbaum@proskauer.com
ecanter@proskauer.com

*Attorneys for B Asset Manager, L.P.,
Beechwood Bermuda International Ltd.,
Beechwood Re Investments, LLC, Mark Feuer,
Scott Taylor, and Dhruv Narain in the SHIP
Action*

MOSKOWITZ & BOOK, LLP

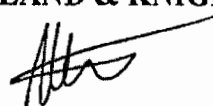
By: _____

Avraham C. Moskowitz
345 Seventh Avenue, 21st Floor
New York, NY 10001
Telephone: (212) 221-7999
Email: amoskowitz@mb-llp.com

*Attorneys for Platinum F.I. Group, LLC and
Abraham Grossman*

HOLLAND & KNIGHT LLP

By: _____


Warren E. Gluck, Esq.
Barbra R. Parlin, Esq.
John L. Brownlee, Esq.
Belevetz, Esq.
Richard A. Bixter Jr., Esq.

31 West 52nd Street
New York, New York 10019
Telephone: (212) 513-3200
Email: warren.gluck@hklaw.com
barbra.parlin@hklaw.com
john.brownlee@hklaw.com
timothy.belevetz@hklaw.com
richard.bixter@hklaw.com

*Attorneys for Plaintiffs Martin Trott and
Christopher Smith, as Joint Official
Liquidators and Foreign Representatives of
Platinum Partners Value Arbitrage Fund L.P.
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**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: _____

Daniel Tepper
270 Madison Avenue
New York, NY 10016
Telephone: (212) 545-4600
Email: tepper@whafh.com

Attorneys for Leon Meyers

SIGNATURES CONTINUE FROM PRECEDING PAGE

PROSKAUER ROSE LLP

By: _____

Mark D. Harris
Steven H. Holinstat
Stacy P. Eilbaum
Edward J. Canter

11 Times Square
New York, NY 10036
Telephone: (212) 969-3000
Email: mharris@proskauer.com
sholinstat@proskauer.com
seilbaum@proskauer.com
ecanter@proskauer.com

*Attorneys for B Asset Manager, L.P.,
Beechwood Bermuda International Ltd.,
Beechwood Re Investments, LLC, Mark Feuer,
Scott Taylor, and Dhruv Narain in the SHIP
Action*

HOLLAND & KNIGHT LLP

By: _____

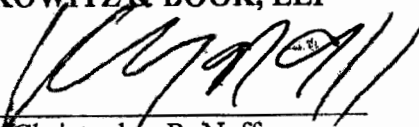
Warren E. Gluck, Esq.
Barbra R. Parlin, Esq.
John L. Brownlee, Esq.
Belevetz, Esq.
Richard A. Bixter Jr., Esq.

31 West 52nd Street
New York, New York 10019
Telephone: (212) 513-3200
Email: warren.gluck@hklaw.com
barbra.parlin@hklaw.com
john.brownlee@hklaw.com
timothy.belevetz@hklaw.com
richard.bixter@hklaw.com

*Attorneys for Plaintiffs Martin Trott and
Christopher Smith, as Joint Official
Liquidators and Foreign Representatives of
Platinum Partners Value Arbitrage Fund L.P.
(in Official Liquidation), and for Platinum
Partners Value Arbitrage Fund L.P. (in
Official Liquidation)*

MOSKOWITZ & BOOK, LLP

By: _____


Christopher R. Neff

345 Seventh Avenue, 21st Floor
New York, NY 10001
Telephone: (212) 221-7999
Email: amoskowitz@mb-llp.com

*Attorneys for Platinum F.I. Group, LLC and
Abraham Grossman*

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: _____

Daniel Tepper
270 Madison Avenue
New York, NY 10016
Telephone: (212) 545-4600
Email: tepper@whafh.com

Attorneys for Leon Meyers

SIGNATURES CONTINUE FROM PRECEDING PAGE

PROSKAUER ROSE LLP

By: _____
Mark D. Harris
Steven H. Holinstat
Stacy P. Eilbaum
Edward J. Canter
11 Times Square
New York, NY 10036
Telephone: (212) 969-3000
Email: mharris@proskauer.com
sholinstat@proskauer.com
seilbaum@proskauer.com
ecanter@proskauer.com

*Attorneys for B Asset Manager, L.P.,
Beechwood Bermuda International Ltd.,
Beechwood Re Investments, LLC, Mark Feuer,
Scott Taylor, and Dhruv Narain in the SHIP
Action*

HOLLAND & KNIGHT LLP

By: _____
Warren E. Gluck, Esq.
Barbra R. Parlin, Esq.
John L. Brownlee, Esq.
Belevetz, Esq.
Richard A. Bixter Jr., Esq.
31 West 52nd Street
New York, New York 10019
Telephone: (212) 513-3200
Email: warren.gluck@hklaw.com
barbra.parlin@hklaw.com
john.brownlee@hklaw.com
timothy.belevetz@hklaw.com
richard.bixter@hklaw.com

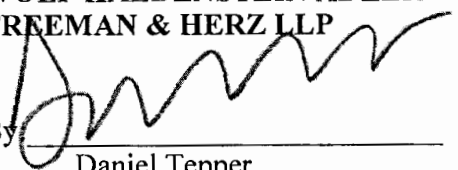
*Attorneys for Plaintiffs Martin Trott and
Christopher Smith, as Joint Official
Liquidators and Foreign Representatives of
Platinum Partners Value Arbitrage Fund L.P.
(in Official Liquidation), and for Platinum
Partners Value Arbitrage Fund L.P. (in
Official Liquidation)*

MOSKOWITZ & BOOK, LLP

By: _____
Avraham C. Moskowitz
345 Seventh Avenue, 21st Floor
New York, NY 10001
Telephone: (212) 221-7999
Email: amoskowitz@mb-llp.com

*Attorneys for Platinum F.I. Group, LLC and
Abraham Grossman*

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By:  _____
Daniel Pepper
270 Madison Avenue
New York, NY 10016
Telephone: (212) 545-4600
Email: tepper@whafh.com

Attorneys for Leon Meyers

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**ROYER COOPER COHEN BRAUNFELD
LLC**

By: _____

Marc E. Hirschfield

Marc F. Skapof

Royer Cooper Cohen Braunfeld LLC

1120 Avenue of the Americas

Fourth Floor

New York, NY 10036

Telephone: (212) 994-0451

Email: MHirschfield@rcbblaw.com

mksapof@rcbblaw.com

Barry L. Cohen

101 West Elm St., Suite 400

Conshohocken, PA 19428

Telephone: (484) 362-2628

Email: bcohen@rcbblaw.com

Attorneys for Twosons Corporation

LANGLER SIFFERT & WOHL LLP

By: _____

David Hodges

Matthew Coogan

500 Fifth Avenue, 34th Floor

New York, NY 10110

Telephone: (212) 921-8399

Email: dhodges@lswlaw.com

mcoogan@lswlaw.com

Attorneys for David Steinberg

**CURTIS, MALLET-PREVOST, COLT &
MOSLE LLP**

By:  _____

Eliot Lauer

Gabriel Hertzberg

Jacques Semmelman

Julia Gumper

101 Park Avenue

New York, NY 10178

Telephone: (212) 696-8856

Email: ghertzberg@curtis.com

elauer@curtis.com

jsemmelman@curtis.com

jgumper@curtis.com

*Attorneys for David Bodner, Beechwood Trust
Nos. 7-14*

**KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP**

By: _____

John E. Jureller

200 West 41st Street, 17th Floor

New York, NY 10036

Telephone: (212) 972-3000

Email: jjureller@klestadt.com

*Attorneys for Defendant Beechwood Re Ltd.
(in Official Liquidation) in the SHIP Action*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

**ROYER COOPER COHEN BRAUNFELD
LLC**

By: _____

Marc E. Hirschfield
Marc F. Skapof
Royer Cooper Cohen Braunfeld LLC
1120 Avenue of the Americas
Fourth Floor
New York, NY 10036
Telephone: (212) 994-0451
Email: MHirschfield@rccblaw.com
mskapof@rccblaw.com

Barry L. Cohen
101 West Elm St., Suite 400
Conshohocken, PA 19428
Telephone: (484) 362-2628
Email: bcohen@rccblaw.com

Attorneys for Twosons Corporation

LANGLER SIFFERT & WOHL LLP

By: _____

David Hodges
Matthew Coogan
500 Fifth Avenue, 34th Floor
New York, NY 10110
Telephone: (212) 921-8399
Email: dhodges@lswlaw.com
mcoogan@lswlaw.com

Attorneys for David Steinberg

**CURTIS, MALLET-PREVOST, COLT &
MOSLE LLP**

By: _____

Eliot Lauer
Gabriel Hertzberg
Jacques Semmelman
Julia Gumper
101 Park Avenue
New York, NY 10178
Telephone: (212) 696-8856
Email: ghertzberg@curtis.com
elauer@curtis.com
jsemmelman@curtis.com
jgumper@curtis.com

*Attorneys for David Bodner, Beechwood Trust
Nos. 7-14*

**KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP**

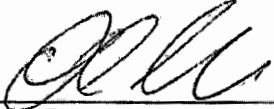
By: _____

John E. Jureller, Jr.
200 West 41st Street, 17th Floor
New York, NY 10036
Telephone: (212) 972-3000
Email: jjureller@klestadt.com

*Attorneys for Defendant Beechwood Re Ltd.
(in Official Liquidation) in the SHIP Action*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

MORRISON COHEN LLP

By: 
Donald Chase
Daniel Isaacs
909 Third Avenue
New York, NY 10022
Telephone: (212) 735-8653
Email: dchase@morrisoncohen.com
disaacs@morrisoncohen.com

Attorneys for Huberfeld Family Foundation

BINDER & SCHWARTZ LLP

By: _____
Wendy H. Schwartz
Gregory C. Pruden
366 Madison Avenue, 6th Floor
New York, NY 10017
Telephone: (212) 510-7008
Email: wschwartz@binderschwartz.com
gpruden@binderschwartz.com

Attorneys for Daniel Saks

PIERCE BAINBRIDGE BECK PRICE & HECHT LLP

By: _____
Eric M. Creizman
747 Third Avenue, Suite 200
New York, NY 10017
Telephone: (212) 972-0200
Email: ecreizman@piercebainbridge.com

Attorneys for David Ottensoser

JEFFREY C. DANIELS PC

By: _____
Jeffrey C. Daniels
4 Carren Circle
Huntington, NY 11743
Telephone: (516) 745-5430
Email: jdaniels@jedpc.com

Attorneys for Murray Huberfeld

PERKINS COIE LLP

By: _____
John Penn
Jeffrey Vanacore
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112
Telephone: (212) 262-6900
Email: jpenn@perkinscoie.com
jvanacore@perkinscoie.com

Attorneys for GRD Estates Ltd.

LAW OFFICES OF KENNETH A. ZITTER

By: _____
Kenneth A. Zitter
260 Madison Avenue
New York, NY 10016
Telephone: (212) 532-8000
Email: kzitter@aol.com

*Attorneys for Estate of Jules Nordlicht,
Barbara Nordlicht, FCBA Trust, Aaron
Parnes, Sarah Parnes, Shmuel Fuchs
Foundation, Solomon Werdiger, Morris Fuchs*

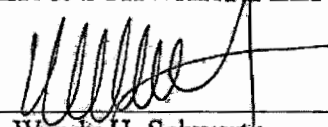
[SIGNATURES CONTINUE FROM PRECEDING PAGE]

MORRISON COHEN LLP

By: _____
Donald Chase
Daniel Isaacs
909 Third Avenue
New York, NY 10022
Telephone: (212) 735-8653
Email: dchase@morrisoncohen.com
disaacs@morrisoncohen.com

Attorneys for Huberfeld Family Foundation

BINDER & SCHWARTZ LLP

By: _____

Wendy H. Schwartz
Gregory C. Pruden
366 Madison Avenue, 6th Floor
New York, NY 10017
Telephone: (212) 510-7008
Email: wschwartz@binderschwartz.com
gpruden@binderschwartz.com

Attorneys for Daniel Saks

PIERCE BAINBRIDGE BECK PRICE & HECHT LLP

By: _____
Eric M. Creizman
747 Third Avenue, Suite 200
New York, NY 10017
Telephone: (212) 972-0200
Email: ecreizman@piercebainbridge.com

Attorneys for David Ottensoser

JEFFREY C. DANIELS PC

By: _____
Jeffrey C. Daniels
4 Carren Circle
Huntington, NY 11743
Telephone: (516) 745-5430
Email: jdaniels@jcdpc.com

Attorneys for Murray Huberfeld

PERKINS COIE LLP

By: _____
John Penn
Jeffrey Vanacore
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112
Telephone: (212) 262-6900
Email: jpenn@perkinscoie.com
jvanacore@perkinscoie.com

Attorneys for GRD Estates Ltd.

LAW OFFICES OF KENNETH A. ZITTER

By: _____
Kenneth A. Zitter
260 Madison Avenue
New York, NY 10016
Telephone: (212) 532-8000
Email: kzitter@aol.com

*Attorneys for Estate of Jules Nordlicht,
Barbara Nordlicht, FCBA Trust, Aaron
Parnes, Sarah Parnes, Shmuel Fuchs
Foundation, Solomon Werdiger, Morris Fuchs*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

MORRISON COHEN LLP

By: _____
Donald Chase
Daniel Isaacs
909 Third Avenue
New York, NY 10022
Telephone: (212) 735-8653
Email: dchase@morrisoncohen.com
disaacs@morrisoncohen.com

Attorneys for Huberfeld Family Foundation

BINDER & SCHWARTZ LLP

By: _____
Wendy H. Schwartz
Gregory C. Pruden
366 Madison Avenue, 6th Floor
New York, NY 10017
Telephone: (212) 510-7008
Email: wschwartz@binderschwartz.com
gpruden@binderschwartz.com

Attorneys for Daniel Saks

**PIERCE BAINBRIDGE BECK PRICE &
HECHT LLP**

By: *Eric Creizman // ga //*
Eric M. Creizman
747 Third Avenue, Suite 200
New York, NY 10017
Telephone: (212) 972-0200
Email: ecreizman@piercebainbridge.com

Attorneys for David Ottensoser

JEFFREY C. DANIELS PC

By: _____
Jeffrey C. Daniels
4 Carren Circle
Huntington, NY 11743
Telephone: (516) 745-5430
Email: jdaniels@jcdpc.com

Attorneys for Murray Huberfeld

PERKINS COIE LLP

By: _____
John Penn
Jeffrey Vanacore
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112
Telephone: (212) 262-6900
Email: jpenn@perkinscoie.com
jvanacore@perkinscoie.com

Attorneys for GRD Estates Ltd.

**LAW OFFICES OF KENNETH A.
ZITTER**

By: _____
Kenneth A. Zitter
260 Madison Avenue
New York, NY 10016
Telephone: (212) 532-8000
Email: kzitter@aol.com

*Attorneys for Estate of Jules Nordlicht,
Barbara Nordlicht, FCBA Trust, Aaron
Parnes, Sarah Parnes, Shmuel Fuchs
Foundation, Solomon Werdiger, Morris Fuchs*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

MORRISON COHEN LLP

By: _____
Donald Chase
Daniel Isaacs
909 Third Avenue
New York, NY 10022
Telephone: (212) 735-8653
Email: dchase@morrisoncohen.com
disaacs@morrisoncohen.com

Attorneys for Huberfeld Family Foundation

BINDER & SCHWARTZ LLP

By: _____
Wendy H. Schwartz
Gregory C. Pruden
366 Madison Avenue, 6th Floor
New York, NY 10017
Telephone: (212) 510-7008
Email: wschwartz@binderschwartz.com
gpruden@binderschwartz.com


Attorneys for Daniel Saks

PIERCE BAINBRIDGE BECK PRICE & HECHT LLP

By: _____
Eric M. Creizman
747 Third Avenue, Suite 200
New York, NY 10017
Telephone: (212) 972-0200
Email: ecreizman@piercebainbridge.com

Attorneys for David Ottensoser

JEFFREY C. DANIELS PC

By: 
Jeffrey C. Daniels
4 Carren Circle
Huntington, NY 11743
Telephone: (516) 745-5430
Email: jdaniels@jcdpc.com

Attorneys for Murray Huberfeld

PERKINS COIE LLP

By: _____
John Penn
Jeffrey Vanacore
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112
Telephone: (212) 262-6900
Email: jpenn@perkinscoie.com
jvanacore@perkinscoie.com

Attorneys for GRD Estates Ltd.

LAW OFFICES OF KENNETH A. ZITTER

By: _____
Kenneth A. Zitter
260 Madison Avenue
New York, NY 10016
Telephone: (212) 532-8000
Email: kzitter@aol.com

*Attorneys for Estate of Jules Nordlicht,
Barbara Nordlicht, FCBA Trust, Aaron
Parnes, Sarah Parnes, Shmuel Fuchs
Foundation, Solomon Werdiger, Morris Fuchs*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

MORRISON COHEN LLP

By: _____
Donald Chase
Daniel Isaacs
909 Third Avenue
New York, NY 10022
Telephone: (212) 735-8653
Email: dchase@morrisoncohen.com
disaacs@morrisoncohen.com

Attorneys for Huberfeld Family Foundation

BINDER & SCHWARTZ LLP

By: _____
Wendy H. Schwartz
Gregory C. Pruden
366 Madison Avenue, 6th Floor
New York, NY 10017
Telephone: (212) 510-7008
Email: wschwartz@binderschwartz.com
gpruden@binderschwartz.com

Attorneys for Daniel Saks

**PIERCE BAINBRIDGE BECK PRICE &
HECHT LLP**

By: _____
Eric M. Creizman
747 Third Avenue, Suite 200
New York, NY 10017
Telephone: (212) 972-0200
Email: ecreizman@piercebainbridge.com

Attorneys for David Ottensoser

JEFFREY C. DANIELS PC

By: _____
Jeffrey C. Daniels
4 Carren Circle
Huntington, NY 11743
Telephone: (516) 745-5430
Email: jdaniels@jcdpc.com

Attorneys for Murray Huberfeld

PERKINS COIE LLP

By: _____
John Penn
Jeffrey Vanacore
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112
Telephone: (212) 262-6900
Email: jpenn@perkinscoie.com
jvanacore@perkinscoie.com

Attorneys for GRD Estates Ltd.

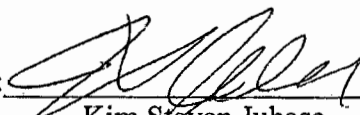
**LAW OFFICES OF KENNETH A.
ZITTER**

By:  _____
Kenneth A. Zitter
260 Madison Avenue
New York, NY 10016
Telephone: (212) 532-8000
Email: kzitter@aol.com

*Attorneys for Estate of Jules Nordlicht,
Barbara Nordlicht, FCBA Trust, Aaron
Parnes, Sarah Parnes, Shmuel Fuchs
Foundation, Solomon Werdiger, Morris Fuchs*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

NOVAK JUHASE & STERN

By: 
Kim Steven Juhase
200 Sheffield St., Suite 205
Mountainside, NJ 07092
Telephone: (908) 233-0045
Email: kimjuhase@cs.com

Attorney for Bernard Fuchs

REGOSIN, EDWARD, STONE & FEDER

By: _____
Saul Feder
225 Broadway, Suite 613
New York, New York 10007
Telephone: (212) 619-1900
Email: sfeder@resflaw.com

*Attorneys for Mark Nordlicht and Platinum
Management (NY) LLC*

LAWRENCE R. GELBER

By: _____
Lawrence R. Gelber
34 Plaza Street East, Suite 1107
Brooklyn, NY 11238
Telephone: (718) 683-2383
Email: Gelberlaw@aol.com

*Attorneys for Michael Nordlicht, Kevin
Cassidy*

**MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO, P.C.**

By: _____
Therese M. Doherty
LisaMarie F. Collins
666 Third Avenue
New York, NY 10017
Telephone: (212) 935-3000
Email: LCollins@mintz.com
TMDoherty@mintz.com

*Attorneys for Michael Nordlicht, Kevin
Cassidy and Meadows Capital LLC*

THOMPSON & KNIGHT LLP

By: _____
Stuart Glick
Nicholas Davis
Brittney Edwards
900 Third Avenue, 20th Floor
New York, NY 10022
Telephone: (212) 751-3392
Email: Stuart.glick@tklaw.com
Nick.davis@tklaw.com
Brittney.edwards@tklaw.com

Attorneys for Michael Katz

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

NOVAK JUHASE & STERN

By: _____
Kim Steven Juhase
200 Sheffield St., Suite 205
Mountainside, NJ 07092
Telephone: (908) 233-0045
Email: kimjuhase@cs.com

Attorney for Bernard Fuchs

REGOSIN, EDWARD, STONE & FEDER

By: _____
Saul Feder
225 Broadway, Suite 613
New York, New York 10007
Telephone: (212) 619-1900
Email: sfeder@resflaw.com

*Attorneys for Mark Nordlicht and Platinum
Management (NY) LLC*

LAWRENCE R. GELBER

By: _____
Lawrence R. Gelber
34 Plaza Street East, Suite 1107
Brooklyn, NY 11238
Telephone: (718) 683-2383
Email: Gelberlaw@aol.com

*Attorneys for Michael Nordlicht, Kevin
Cassidy*

**MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO, P.C.**

By: _____
Therese M. Doherty
LisaMarie F. Collins
666 Third Avenue
New York, NY 10017
Telephone: (212) 935-3000
Email: LCollins@mintz.com
TMDoherty@mintz.com

*Attorneys for Michael Nordlicht, Kevin
Cassidy and Meadows Capital LLC*

THOMPSON & KNIGHT LLP

By: _____
Stuart Glick
Nicholas Davis
Brittney Edwards
900 Third Avenue, 20th Floor
New York, NY 10022
Telephone: (212) 751-3392
Email: Stuart.glick@tklaw.com
Nick.davis@tklaw.com
Brittney.edwards@tklaw.com

Attorneys for Michael Katz

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

NOVAK JUHASE & STERN

By: _____
Kim Steven Juhase
200 Sheffield St., Suite 205
Mountainside, NJ 07092
Telephone: (908) 233-0045
Email: kimjuhase@cs.com

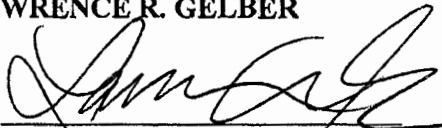
Attorney for Bernard Fuchs

REGOSIN, EDWARD, STONE & FEDER

By: _____
Saul Feder
225 Broadway, Suite 613
New York, New York 10007
Telephone: (212) 619-1900
Email: sfeder@resflaw.com

*Attorneys for Mark Nordlicht and Platinum
Management (NY) LLC*

LAWRENCE R. GELBER

By:  _____
Lawrence R. Gelber
34 Plaza Street East, Suite 1107
Brooklyn, NY 11238
Telephone: (718) 683-2383
Email: Gelberlaw@aol.com

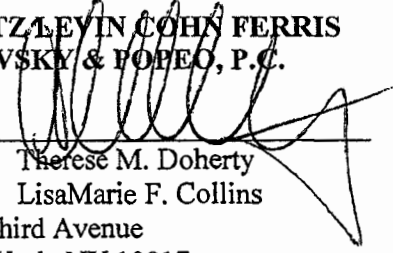
*Attorneys for Michael Nordlicht, Kevin
Cassidy*

THOMPSON & KNIGHT LLP

By: _____
Stuart Glick
Nicholas Davis
Brittney Edwards
900 Third Avenue, 20th Floor
New York, NY 10022
Telephone: (212) 751-3392
Email: Stuart.glick@tklaw.com
Nick.davis@tklaw.com
Brittney.edwards@tklaw.com

Attorneys for Michael Katz

**MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO, P.C.**

By:  _____
Therese M. Doherty
Lisa Marie F. Collins
666 Third Avenue
New York, NY 10017
Telephone: (212) 935-3000
Email: LCollins@mintz.com
TMDoherty@mintz.com

*Attorneys for Michael Nordlicht, Kevin
Cassidy and Meadows Capital LLC*

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

NOVAK JUHASE & STERN

By: _____
Kim Steven Juhase
200 Sheffield St., Suite 205
Mountainside, NJ 07092
Telephone: (908) 233-0045
Email: kimjuhase@cs.com

Attorney for Bernard Fuchs

REGOSIN, EDWARD, STONE & FEDER

By: _____
Saul Feder
225 Broadway, Suite 613
New York, New York 10007
Telephone: (212) 619-1900
Email: sfeder@resflaw.com

*Attorneys for Mark Nordlicht and Platinum
Management (NY) LLC*

LAWRENCE R. GELBER

By: _____
Lawrence R. Gelber
34 Plaza Street East, Suite 1107
Brooklyn, NY 11238
Telephone: (718) 683-2383
Email: Gelberlaw@aol.com

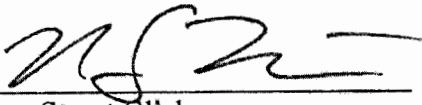
*Attorneys for Michael Nordlicht, Kevin
Cassidy*

**MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO, P.C.**

By: _____
Therese M. Doherty
LisaMarie F. Collins
666 Third Avenue
New York, NY 10017
Telephone: (212) 935-3000
Email: LCollins@mintz.com
TMDoherty@mintz.com

*Attorneys for Michael Nordlicht, Kevin
Cassidy and Meadows Capital LLC*

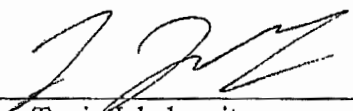
THOMPSON & KNIGHT LLP

By:  _____
Stuart Glick
Nicholas Davis
Brittney Edwards
900 Third Avenue, 20th Floor
New York, NY 10022
Telephone: (212) 751-3392
Email: Stuart.glick@tklaw.com
Nick.davis@tklaw.com
Brittney.edwards@tklaw.com

Attorneys for Michael Katz

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

JAKUBOWITZ & CHUANG LLP

By: 
Tovia Jakubowitz
3019 Avenue J
Brooklyn, NY 1210
Telephone: (347) 230-6622
Email: tovia@jclawllp.com

*Attorneys for Rockwell Fulton Capital, L.P.
Ditmas Park Capital, L.P.*

DUANE MORRIS LLP

By: _____
Eric R. Breslin
Melissa S. Geller
One Riverfront Plaza, Suite 1800
Newark, NJ 07102
Telephone: (973) 424-2000
Email: erbreslin@duanemorris.com
msgeller@duanemorris.com

Attorneys for Estate of Uri Landesman

**WILSON, SONSINI, GOODRICH &
ROSATI, PC**

By: _____
Eli Bard Richlin
Jae Young Jeong
Katherine Talbot McCarthy
Michael S. Sommer
Morris J. Fodeman
1301 Avenue of The Americas, 40th Floor
New York, NY 10019
Telephone: (212) 447-7704
Email: erichlin@wsgr.com
ajeong@wsgr.com
kmccarthy@wsgr.com
msommer@wsgr.com
mfodeman@wsgr.com

Attorneys for David Levy

GIBSON, DUNN & CRUTCHER LLP

By: _____
Chantale Fiebig
Naima L. Farrell
1050 Connecticut Ave N.W.
Washington, DC 20036
Telephone: (202) 955-8244
Email: cfiebig@gibsondunn.com
nfarrell@gibsondunn.com

Attorneys for Dhruv Narain in the SHIP Action

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

JAKUBOWITZ & CHUANG LLP

By: _____
Tovia Jakubowitz
3019 Avenue J
Brooklyn, NY 1210
Telephone: (347) 230-6622
Email: tovia@jclawllp.com

*Attorneys for Rockwell Fulton Capital, L.P.
Ditmas Park Capital, L.P.*

DUANE MORRIS LLP

By: _____
Eric R. Breslin
Melissa S. Geller
One Riverfront Plaza, Suite 1800
Newark, NJ 07102
Telephone: (973) 424-2000
Email: erbreslin@duanemorris.com
msgeller@duanemorris.com

Attorneys for Estate of Uri Landesman

**WILSON, SONSINI, GOODRICH &
ROSATI, PC**

By: _____
Eli Bard Richlin
Jae Young Jeong
Katherine Talbot McCarthy
Michael S. Sommer
Morris J. Fodeman
1301 Avenue of The Americas, 40th Floor
New York, NY 10019
Telephone: (212) 447-7704
Email: erichlin@wsgr.com
ajeong@wsgr.com
kmccarthy@wsgr.com
msommer@wsgr.com
mfodeman@wsgr.com

Attorneys for David Levy

GIBSON, DUNN & CRUTCHER LLP

By: _____
Chantale Fiebig
Naima L. Farrell
1050 Connecticut Ave N.W.
Washington, DC 20036
Telephone: (202) 955-8244
Email: cfiebig@gibsondunn.com
nfarrell@gibsondunn.com

Attorneys for Dhruv Narain in the SHIP Action

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

JAKUBOWITZ & CHUANG LLP

By: _____
Tovia Jakubowitz
3019 Avenue J
Brooklyn, NY 1210
Telephone: (347) 230-6622
Email: tovia@jclawllp.com


*Attorneys for Rockwell Fulton Capital, L.P.
Ditmas Park Capital, L.P.*

DUANE MORRIS LLP

By: _____
Eric R. Breslin
Melissa S. Geller
One Riverfront Plaza, Suite 1800
Newark, NJ 07102
Telephone: (973) 424-2000
Email: erbreslin@duanemorris.com
msgeller@duanemorris.com

Attorneys for Estate of Uri Landesman

**WILSON, SONSINI, GOODRICH &
ROSATI, PC**

By:  _____
Eli Bard Richlin
Jae Young Jeong
Katherine Talbot McCarthy
Michael S. Sommer
Morris J. Fodeman
1301 Avenue of The Americas, 40th Floor
New York, NY 10019
Telephone: (212) 999-5800
Email: erichlin@wsgr.com
ajeong@wsgr.com
kmccarthy@wsgr.com
msommer@wsgr.com
mfodeman@wsgr.com

Attorneys for David Levy

GIBSON, DUNN & CRUTCHER LLP

By: _____
Chantale Fiebig
Naima L. Farrell
1050 Connecticut Ave N.W.
Washington, DC 20036
Telephone: (202) 955-8244
Email: cfiebig@gibsondunn.com
nfarrell@gibsondunn.com

Attorneys for Dhruv Narain in the SHIP Action

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

JAKUBOWITZ & CHUANG LLP

By: _____
Tovia Jakubowitz
3019 Avenue J
Brooklyn, NY 1210
Telephone: (347) 230-6622
Email: tovia@jclawllp.com

*Attorneys for Rockwell Fulton Capital, L.P.
Ditmas Park Capital, L.P.*

DUANE MORRIS LLP

By: _____
Eric R. Breslin
Melissa S. Geller
One Riverfront Plaza, Suite 1800
Newark, NJ 07102
Telephone: (973) 424-2000
Email: erbreslin@duanemorris.com
msgeller@duanemorris.com

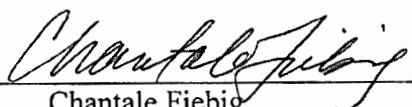
Attorneys for Estate of Uri Landesman

**WILSON, SONSINI, GOODRICH &
ROSATI, PC**

By: _____
Eli Bard Richlin
Jae Young Jeong
Katherine Talbot McCarthy
Michael S. Sommer
Morris J. Fodeman
1301 Avenue of The Americas, 40th Floor
New York, NY 10019
Telephone: (212) 447-7704
Email: erichlin@wsgr.com
ajeong@wsgr.com
kmccarthy@wsgr.com
msommer@wsgr.com
mfodeman@wsgr.com

Attorneys for David Levy

GIBSON, DUNN & CRUTCHER LLP

By: 
Chantale Fiebig
Naima L. Farrell
1050 Connecticut Ave N.W.
Washington, DC 20036
Telephone: (202) 955-8244
Email: cfiebig@gibsondunn.com
nfarrell@gibsondunn.com

Attorneys for Dhruv Narain in the SHIP Action

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

PARKER IBRAHIM & BERG LLP

By: _____

James P. Berg
Daniel A. Schleifstein
Sanjay P. Ibrahim
5 Penn Plaza, Suite 2371
New York, New York 10001
Telephone: (212) 596-7037
Facsimile: (908) 333-6230
Email: james.berg@piblaw.com
daniel.schleifstein@piblaw.com
sanjay.ibrahim@piblaw.com

Please respond to Somerset office:

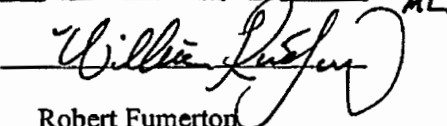
270 Davidson Avenue
Somerset, New Jersey 08873
Telephone: (908) 725-9700
Facsimile: (908) 333-6230

*Attorneys for Defendants BRE BCLIC
Primary, BRE BCLIC Sub, BRE WNIC 2013
LTC Primary and BRE WNIC 2013 LTC Sub*

**SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP**

By: s/ Robert Fumerton

s/ William Ridgway



Robert Fumerton
Charles F. Smith
William Ridgway
Lara A. Flath

155 N. Wacker Drive
Chicago, Illinois
Telephone: (312) 407-0700
Email: charles.smith@skadden.com
william.ridgway@skadden.com
lara.flath@skadden.com

Attorneys for Lincoln International LLP

Dated: New York, New York
May __, 2019

SO ORDERED:

Jed S. Rakoff, U.S.D.J.

[SIGNATURES CONTINUE FROM PRECEDING PAGE]

PARKER IBRAHIM & BERG LLP

By: 

James P. Berg
Daniel A. Schleifstein
Sanjay P. Ibrahim
5 Penn Plaza, Suite 2371
New York, New York 10001
Telephone: (212) 596-7037
Facsimile: (908) 333-6230
Email: james.berg@piblaw.com
daniel.schleifstein@piblaw.com
sanjay.ibrahim@piblaw.com

Please respond to Somerset office:

270 Davidson Avenue
Somerset, New Jersey 08873
Telephone: (908) 725-9700
Facsimile: (908) 333-6230

*Attorneys for Defendants BRE BCLIC
Primary, BRE BCLIC Sub, BRE WNIC 2013
LTC Primary and BRE WNIC 2013 LTC Sub*

****Subject to Defendants' preservation of, and
without waiver of, any rights to object to the
propriety of the foregoing trusts as identified
and pled in the Complaint****

Dated: New York, New York
May 2, 2019

**SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP**

By: _____

Robert Fumerton
Charles F. Smith
William Ridgway
Lara A. Flath
155 N. Wacker Drive
Chicago, Illinois
Telephone: (312) 407-0700
Email: charles.smith@skadden.com
william.ridgway@skadden.com
lara.flath@skadden.com

Attorneys for Lincoln International LLP

SO ORDERED:


Jed S. Rakoff, U.S.D.J.